

AFFIDAVIT OF SPECIAL AGENT LISA A. CRANDALL
IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lisa A. Crandall, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since June 2010 and I am currently assigned to the Boston Division, Lakeville Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to, among other things, the online sexual exploitation of children. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in different forms of media, including digital media.
2. This affidavit is submitted in support of a criminal complaint charging Derek Sheehan (“SHEEHAN”), DOB xx/xx/1970, of Norwell, MA, with sexual exploitation of children, in violation of 18 U.S.C. §§ 2251(a) and (e).
3. The statements contained in this affidavit are based upon my personal observations, training and experience, and review of relevant records related to this investigation, as well as information provided to me by other local and state law enforcement officers involved in this investigation.
4. This affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint. In submitting this affidavit, I have not included each and every fact known to me concerning this investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

STATEMENT OF PROBABLE CAUSE

5. On August 17, 2018, members of the Massachusetts State Police (MSP) and the Norwell Police Department executed a search warrant at 1 Spring Brook Drive in Norwell, Massachusetts, the residence of Derek SHEEHAN. In the course of the execution of that warrant, investigators seized several electronic devices, which were transported off-site for forensic examination.
6. In the course of the forensic examination of one of the devices – specifically, SHEEHAN’s cell phone – a trooper assigned to MSP’s Computer Crimes Unit observed photographs containing what he believed to be child pornography. Accordingly, Norwell Police obtained an additional search warrant from the Hingham District Court that authorized them to search the devices in their custody specifically for evidence of child pornography.
7. In the course of the execution of that warrant, investigators have discovered video evidence of SHEEHAN’s sexual abuse of a minor child (MINOR VICTIM A)¹ while the child is apparently sleeping in SHEEHAN’s home. MINOR VICTIM A is known to SHEEHAN; he is a friend of SHEEHAN’s son and SHEEHAN had coached MINOR VICTIM A’s Norwell youth football team.
8. Specifically, on a 3-terabyte Western Digital external drive,² investigators found hours of footage of SHEEHAN assaulting MINOR VICTIM A, which appear to correspond to three separate dates: March 16, 2017; March 19, 2017; and April 8, 2018.
9. In summary, the videos include:

¹ MINOR VICTIM A is known to investigators; he was interviewed in the course of the investigation that led to SHEEHAN’s arrest on Barnstable District Court charges that include indecent assault and battery on a child under 14, in violation of M.G.L. c. 265, § 13B.

² The drive was manufactured in Thailand.

- a. In a series of clips that total approximately seven hours of video and which appear to have been created on March 16, 2017, SHEEHAN is depicted [REDACTED]

[REDACTED].³ MINOR VICTIM A was 11 years old on this date. Throughout the course of the footage, MINOR VICTIM A appears to be sleeping on a futon in SHEEHAN's home office. The video is apparently taken from a camera that is positioned on the top of a metal shelving unit in SHEEHAN's office. Photographs of the shelving unit show that on the day of the search warrant, the unit was full of miscellaneous items that would easily conceal a camera capable of taking such video.

- b. In a series of clips that total approximately 11 hours of video and which appear to have been created on March 19, 2017, SHEEHAN is depicted [REDACTED]

[REDACTED].⁴ MINOR VICTIM A was 11 years old on this date. Throughout the course of the footage, MINOR VICTIM A appears to be sleeping on a futon in SHEEHAN's home office. The video is apparently taken from a camera that is positioned on the top of a metal shelving unit in SHEEHAN's office. Photographs of the shelving unit show that on the day of the search warrant, the unit was full of miscellaneous items that would easily conceal a camera capable of taking such video.

³ Portions of these videos are available for the Court's review.

⁴ Portions of these videos are available for the Court's review.

c. In a series of clips that total approximately five hours of video and which appear to have been created on April 8, 2018, SHEEHAN is depicted [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁵ Throughout the course of the footage, MINOR VICTIM A appears to be sleeping on a futon in SHEEHAN's home office while SHEEHAN's minor son sleeps nearby on another piece of furniture. At the end of the footage, SHEEHAN can be seen facing MINOR VICTIM A, with his back to the camera, moving his arm in a manner that appears to be consistent with masturbation of his own penis. After approximately five minutes, SHEEHAN turns to face the camera and can be seen using a sock to wipe off the end of his penis. The video is apparently taken from a camera that is positioned on the top of a metal shelving unit in SHEEHAN's office. Photographs of the shelving unit show that on the day of the search warrant, the unit was full of miscellaneous items that would easily conceal a camera capable of taking such video.

10. Based in part on the footage described above, SHEEHAN was charged by complaint in the Hingham District Court with several offenses, including three counts of aggravated rape of a child, in violation of M.G.L. c. 265, § 22A. I am aware that he is currently in the custody of the Plymouth County Sheriff.⁶

⁵ Portions of these videos are available for the Court's review.

⁶ SHEEHAN was previously charged in the Hingham District Court with one count of indecent assault and battery on a child under 14, in violation of M.G.L. c. 265, § 13B. That case does not involve MINOR VICTIM A.

11. Given the number of devices seized, the high storage capacity of many of the devices seized, and the fact that investigators have found some of the devices to be encrypted, the forensic analysis of the devices seized from SHEEHAN's home remains ongoing.

CONCLUSION

12. Based upon the information set forth above, I submit that there is probable cause to believe that on or about March 16, 2017, March 19, 2017, and April 8, 2018, Derek SHEEHAN did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, or transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so, all in violation of 18 U.S.C. §§ 2251(a) and (e).



LISA A. CRANDALL
Special Agent, FBI

SWORN AND SUBSCRIBED TO BEFORE ME ON September 18, 2018.



Honorable M. Page Kelley
UNITED STATES MAGISTRATE JUDGE



I have portions of the video footage referenced in paragraph 9 above, and I find probable cause to believe that the video footage depicts a minor engaged in sexually explicit conduct. The Affiant shall preserve said videos for the duration of the pendency of this matter, including any relevant appeal process.


Honorable M. Page Kelley
UNITED STATES MAGISTRATE JUDGE